

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

**IN RE: AME CHURCH EMPLOYEE
RETIREMENT FUND LITIGATION**

MDL Docket No. 1:22-md-03035-STA-jay

ALL CASES

Honorable S. Thomas Anderson

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENTS WITH AME DEFENDANTS AND
DEFENDANT NEWPORT GROUP, INC.**

Plaintiffs Reverend Pearce Ewing, Reverend Charles R. Jackson, Reverend Cedric V. Alexander, Reverend Derrell Wade, Reverend Reuben J. Boyd, Presiding Elder Phillip Russ, IV, Lynette Glenn, Guardian of Reverend Marcius King, Reverend Matthew Ewing, Candace L. Carmichael, as Administrator of the Estate of Reverend A. Offord Carmichael, Deceased, and Reverend Diane Conley, on behalf of themselves and all others similarly situated, (collectively, "Plaintiffs") respectfully move, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for preliminary approval of a proposed class action settlement with Defendants African Methodist Episcopal Church ("AMEC"), AMEC Ministerial Retirement Annuity Plan, AMEC Department of Retirement Services, AMEC General Board, and the AMEC Council of Bishops (collectively the "AME Defendants"). Additionally, Plaintiffs respectfully move for preliminary approval of a proposed class action settlement with Defendant Newport Group, Inc.

For the reasons set forth in the supporting Memorandum of Law, Plaintiffs respectfully move the Court for an order:

1. Granting preliminary approval of the Settlements as fair, adequate, and reasonable, and allowing dissemination of the long form Notice to the proposed Class Members under Rule

23(e);

2. Appointing Plaintiffs as Class Representatives for purposes of the Settlements;
3. Appointing as Class Counsel the law firms of Milberg Coleman Bryson Phillips Grossman, PLLC, Osborne & Francis Law Firm, PLLC, Stranch Jennings & Garvey, PLLC, Kantor & Kantor, LLC, Lieff Cabraser Heimann & Bernstein, LLP, Blue, LLP, Wright & Schulte, LLC, and the AARP Foundation for purposes of effectuating the Settlements;
4. Conditionally certifying pursuant to Rule 23(b)(3) the following Class for purposes of the Settlements:

Class: All persons who were participants, or were those participants' respective beneficiaries entitled to benefits, in the African Methodist Episcopal Church Ministerial Retirement Annuity Plan on June 30, 2021. Defendants are excluded from the Class.
5. Appointing Verita Global, LLC as Settlement Administrator for purposes of effectuating the Settlements;
6. Approving the form and content of the proposed Long Form Notices and the proposed Notice Plan; and
7. Scheduling a fairness hearing for final approval of the Settlements.

Respectfully submitted, this the 4th day of March, 2025.

| <u>Interim Co-Lead Counsel</u> | |
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| <p style="text-align: center;"><u>/s/ Matthew E. Lee</u> Matthew E. Lee MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC 900 W. Morgan Street Raleigh, NC 27603 919-600-5000 Fax: 919-600-5035 mlee@milberg.com</p> | <p style="text-align: center;"><u>/s/ Gregorio A. Francis</u> Gregorio A. Francis OSBORNE & FRANCIS LAW FIRM, PLLC 2707 E. Jefferson Street Orlando, FL 32803 (561) 293-2600 Fax: (561) 923-8100 gfrancis@realtoughlawyers.com</p> |

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CERTIFICATE OF SERVICE

This is to certify that on March 4, 2025, the foregoing **MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENTS WITH AME DEFENDANTS AND DEFENDANT NEWPORT GROUP, INC.** was served via the Court's CM/ECF system on all counsel of record.

/s/ Matthew E. Lee

Matthew E. Lee